

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF OHIO  
WESTERN DIVISION**

BAOYANG CHEN,	:	CASE NO. 1:17-cv-00460-MRB
		Judge Michael R. Barrett
Plaintiff,	:	Magistrate Judge Stephanie K. Bowman
 v.	:	
GSC OPPORTUNITIES, LP, et al.,	:	<b>PLAINTIFF’S SECOND MOTION TO MODIFY SCHEDULING ORDER</b>
 Defendants.	:	

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Now comes Plaintiff Baoyang Chen, through counsel, and hereby moves the Court to modify the Scheduling Order 45 days to extend Plaintiff’s expert disclosure and report of experts (“Plaintiff’s Expert Disclosure”), Defendant’s expert disclosure and report of experts (“Defendant’s Expert Disclosure”), and rebuttal report of experts (“Rebuttal Expert Report”). In support thereof, Plaintiff states:

1. On April 11, 2024, the parties submitted their Rule 26(f) report.
2. On April 23, 2024, the Court entered the Calendar Order establishing the following deadlines, among others:
  - a. Plaintiff’s Expert Disclosure: June 30, 2024 (Actual date July 1, 2024 due to the 30<sup>th</sup> falling on a Sunday)
  - b. Defendant’s Expert Disclosure: September 30, 2024
  - c. Rebuttal Expert Report: November 30, 2024
3. On July 1, 2024, Plaintiff moved the Court for an additional 45 days to identify experts and provide reports [Doc. 148], which was granted on August 1, 2024 [Doc. 149].

Plaintiff’s counsel expects to conclude his search by the end of August 2024 the expert

will need time to review materials and prepare the report. Plaintiff asks for a deadline of September 30, 2024 to complete Plaintiff's Expert Disclosure.

4. The additional time will not disrupt the other case deadlines and the case will stay on track for a July 2025 trial.
5. The new deadlines would be:
  - a. Plaintiff's Expert Disclosure: September 30, 2024
  - b. Defendant's Expert Disclosure: December 31, 2024
  - c. Rebuttal Expert Report: January 31, 2024
6. Defendant will not be prejudiced by the requested extensions.

Accordingly, Plaintiff requests an additional extension of the above expert deadlines.

Respectfully submitted,

/s/ Christopher D. Cathey

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**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on this 15th day of August, 2024, I electronically filed the foregoing with the Clerk of the Court by using the Court's CM/ECF E-Filing System, which will send a notice of electronic filing to all counsel of record at their respective designated e-mail addresses, including:

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/s/ Christopher D. Cathey  
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